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May 26, 2020

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**VIA E-MAIL (IDTHEFT@OAG.STATE.MD.US)**

Office of the Attorney General  
Attn: Jeff Karberg, Administrator of the Identity Theft Program  
Attn: Security Breach Notification  
200 St. Paul Place  
Baltimore, MD 21202

**Re: Notification of a Data Security Incident**

Dear Mr. Karberg:

We represent Emerson Hospital (“Emerson”) in connection with a recent incident that may have impacted the personal information of four (4) Maryland residents, and provide this notice on behalf of Emerson pursuant to MD. CODE ANN., COM. LAW§ 14-3504(h). We will supplement this letter, if necessary, with any new significant facts discovered subsequent to its submission. While Emerson is notifying you of this incident, Emerson does not waive any rights or defenses relating to the incident or this notice.

**NATURE OF THE SECURITY BREACH OR UNAUTHORIZED USE OR ACCESS**

On or around March 20, 2020, PaperlessPay Corporation (“PPC”) notified Emerson of a security incident that it recently experienced. Emerson contracts with PPC for the provision of online paystubs and W-2 tax forms. According to PPC, on February 19, 2020, the Department of Homeland Security (“DHS”) contacted PPC and notified it that someone was purporting to sell access to PPC’s client database on the dark web. PPC shut down its web server and SQL server and implemented additional security controls. PPC worked with DHS and the Federal Bureau of Investigation (“FBI”) and retained a cybersecurity firm to conduct a forensic investigation. PPC has not provided Emerson any additional information on the progress or outcome of the investigation. Upon receiving notification from PPC, Emerson immediately stopped sending data to PPC, and cancelled its contract with PPC. Emerson and PPC are working together to obtain additional information concerning the incident, including what, if any information the threat-actor may have acquired.

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Polsinelli PC, Polsinelli LLP in California

May 26, 2020

Page 2

At this point, Emerson is not aware of an unauthorized access or acquisition of its employees' personal information or that any of the information has been misused. However, PPC could not definitely rule out the possibility that someone accessed or acquired Emerson's employees' personal information. Accordingly, Emerson is notifying the potentially impacted employees and arranged for complementary identity theft protection services for the employees.

#### **NUMBER OF MARYLAND RESIDENTS AFFECTED**

Emerson determined that the incident potentially impacted four (4) Maryland residents. Emerson is notifying the potentially impacted Maryland residents of the incident by letter later today. Enclosed is a copy of the notice that Emerson is sending to the impacted individuals.

#### **STEPS TAKEN RELATING TO THE INCIDENT**

Upon becoming aware of the incident, Emerson promptly investigated the incident to determine what, if any, personal information a third party might have acquired during the incident. Emerson is also providing complimentary identity theft protection services to the impacted individuals through Experian.

#### **CONTACT INFORMATION**

Please contact me if you have any questions or if I can provide you with any further information concerning this matter.

Sincerely,



Michael J. Waters

Enclosure